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October 24, 2002

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Christopher Morris  
 Campaign Finance Analyst  
 Reports Analyst Division  
 Federal Election Commission  
 999 E Street, N.W.  
 Washington, D.C. 20463

Re: Iranian American Political Action Committee, Inc.  
 C00382028  
 Statement of Organization

Dear Mr. Morris:

This letter is in response to your October 16, 2002 letter and our telephone conference of October 22, 2002 regarding the Iranian American Political Action Committee, Inc. ("IAPAC"). Uncharacteristically, your office has requested information confirming that (1) IAPAC is not a separate segregated fund despite the fact it is not reported as one and (2) during our telephone conference you requested justification as to why IAPAC is incorporated.

As stated in the September 17, 2002 IAPAC Statement of Organization, the committee is a non-connected federal political committee, not a separate segregated fund.

As part of the committee's complete name, the term "Inc." is included to signify that it is an incorporated entity. Our firm routinely incorporates authorized and non-connected committees and this is the first instance in which anyone from the Commission has requested an explanation of our firm as to why the committee was incorporated. This incorporation was undertaken in compliance with the Commission's Regulations at 11 C.F.R. § 114.12 which states "(a) An organization may incorporate and not be subject to the provisions of this part if the organization incorporates for liability purposes only, and if the organization is a political committee as defined in 11 C.F.R. 100.5." IAPAC has incorporated for liability purposes only and is a political committee as defined in 11 C.F.R. § 100.5.

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